

## Exhibit F

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
(SAN FRANCISCO DIVISION)

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Case No.  
07-5944 SC

THIS DOCUMENT RELATES TO:  
INDIRECT PURCHASER ACTIONS

MDL No. 1917

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
CITY AND COUNTY OF SAN FRANCISCO

STATE OF CALIFORNIA, et al.,  
Plaintiffs,

vs.

Case No.  
CGC-11-51584

SAMSUNG SDI, INC., CO., LTD.,  
et al.,  
Defendants.

VIDEOTAPED  
DEPOSITION OF:

DAVID RANDALL ROOKS

TAKEN ON BEHALF OF:

TOSHIBA DEFENDANTS

DATE TAKEN:

FRIDAY, NOVEMBER 30, 2012

TIME:

9:10 A.M. - 2:57 P.M.

PLACE:

20 NORTH ORANGE AVENUE  
SUITE 1600  
ORLANDO, FLORIDA 32801

TAKEN BEFORE:

NINETTE LONG, RPR, FPR, CLR  
AND NOTARY PUBLIC

1 perhaps the most expensive television you looked at?

2 A. For a 31-inch CRT television, it would be my  
3 guess that, yes, it probably was. And that's why I  
4 struggled with it.

5 Q. Do you remember how much more your television  
6 was than the other brands?

7 A. No, I don't.

8 Q. Did a user guide or manual come with your  
9 product?

10 A. Yes, it did.

11 Q. Do you still have that?

12 A. No, I don't.

13 (CRT [Exhibit 593](#) was marked for  
14 Identification.)

15 BY MS. NAIFEH:

16 Q. I'd like to mark this as 593. I represent  
17 that I obtained this document from Panasonic's website.  
18 Can you please tell me what this document is?

19 A. Yeah. It looks like -- it appears to be the  
20 Panasonic color television operating instructions.

21 Q. Okay. Does it look familiar to you?

22 A. It looks -- it looks familiar.

23 Q. Does it look like the owner's manual that came  
24 with your television?

25 A. I don't know.

1 Q. You don't know.

2 A. Yeah. I don't know.

3 Q. Okay. Can you identify the model number of  
4 the television you purchased?

5 A. If it's on the invoice. That's the only way  
6 I'd be able to identify it, the model number.

7 Q. Okay. So is that the only document you have  
8 that would refresh your recollection?

9 A. Yes.

10 Q. Do you still have the Panasonic television?

11 A. No.

12 Q. Mr. Rooks, I'm going to hand you a document  
13 that has been already marked as Exhibit 373. So if you  
14 could turn to the second page of this document where it  
15 says Samsung Exhibit B34 at the top.

16 A. Uh-huh.

17 Q. Does this document look familiar to you?

18 A. Yes.

19 Q. Under No. 1, where it says CRT Product,  
20 Panasonic Television Model CT36HX41, is that the model  
21 number of your Panasonic television?

22 A. If that's what it says on the invoice.

23 Q. Okay. Let's take a look at the invoice.

24 MS. NAIFEH: So we don't have the copies yet,  
25 do we, from --

1 foundation.

2 Can I have a standing objection, lacks  
3 foundation, to any questions based on 596?

4 BY MS. NAIFEH:

5 Q. Does this document refresh your recollection  
6 that your television was a 36-inch television?

7 MR. GRALEWSKI: Object to the form. Lacks  
8 foundation.

9 Counsel, can I have a standing objection to  
10 any questions based on 596 as lack of foundation?

11 MS. NAIFEH: Okay.

12 MR. GRALEWSKI: Thank you.

13 You can answer the question.

14 THE WITNESS: Okay. That's a possibility.

15 BY MS. NAIFEH:

16 Q. It's possible that it was a 36-inch  
17 television.

18 A. It's possible. I don't recall.

19 Q. Okay.

20 A. I just know it was heavy.

21 Q. But you stated that you -- you no longer own  
22 the television?

23 A. No, I don't.

24 Q. And you never measured it, so it's possible  
25 that it could be a 36-inch television.

1 Q. Okay. Were you concerned about -- what would  
2 happen after the extended warranty expired?

3 A. No.

4 Q. Okay. Why not?

5 A. At that point in time, if we're talking about  
6 four years, you're talking about an average of \$500 a  
7 year for a television set. I was comfortable at that  
8 point in time with that. And then if after four or five  
9 years I needed to get a new television set, then that  
10 was fine.

11 Q. Was the size of the television important?

12 A. Yes.

13 Q. Why?

14 A. Bigger picture.

15 Q. Were there other larger TVs you could have  
16 bought?

17 A. Yes.

18 Q. And why didn't you buy those?

19 A. Price.

20 Q. Was the manufacturer of the cathode ray tube  
21 important?

22 A. No.

23 Q. Do you know who manufactured the cathode ray  
24 tube inside your television?

25 A. No.